

ACCO,(AGRx),DISCOVERY,MANADR

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA (Western Division – Los Angeles)  
CIVIL DOCKET FOR CASE #: 2:19-cv-02058-CAS-AGR**

Immigrant Defenders Law Center et al v. United States  
Immigration and Customs Enforcement, et al  
Assigned to: Judge Christina A. Snyder  
Referred to: Magistrate Judge Alicia G. Rosenberg  
Cause: 05:552 Freedom of Information Act

Date Filed: 03/20/2019  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**Immigrant Defenders Law Center**

represented by **Alexandra Achamallah**  
Milbank LLP  
2029 Century Park East 33rd Floor  
Los Angeles, CA 90067  
424-386-4000  
Fax: 213-629-5063  
Email: [aachamallah@milbank.com](mailto:aachamallah@milbank.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Michael Bryan Kaufman**  
ACLU Foundation of Southern California  
1313 West 8th Street  
Los Angeles, CA 90017  
213-977-9500  
Fax: 213-977-5297  
Email: [mkaufman@aclusocal.org](mailto:mkaufman@aclusocal.org)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Paul S Aronzon**  
Milbank LLP  
2029 Century Park East 33rd Floor  
Los Angeles, CA 90067  
424-386-4000  
Fax: 213-629-5063  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Robert J Liubicic**  
Milbank LLP  
2029 Century Park East 33rd Floor  
Los Angeles, CA 90067  
424-386-4000  
Fax: 213-629-5063  
Email: [rliubicic@milbank.com](mailto:rliubicic@milbank.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Jessica Karp Bansal**  
ACLU Foundation of Southern California  
1313 West 8th Street  
Los Angeles, CA 90017  
909-380-7501  
Fax: 909-332-7280  
Email: [jbansal@aclusocal.org](mailto:jbansal@aclusocal.org)  
**ATTORNEY TO BE NOTICED**

**Sameer Ahmed**  
ACLU of Southern California  
1313 West Eight Street

Los Angeles, CA 90017  
213-977-5284  
Fax: 213-977-5297  
Email: [sahmed@aclusocal.org](mailto:sahmed@aclusocal.org)  
TERMINATED: 07/29/2019  
PRO HAC VICE

**Plaintiff**

**Western State College of Law  
Immigration Clinic**

represented by **Alexandra Achamallah**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Michael Bryan Kaufman**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Paul S Aronzon**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert J Liubicic**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Jessica Karp Bansal**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Sameer Ahmed**  
(See above for address)  
TERMINATED: 07/29/2019  
PRO HAC VICE

**Plaintiff**

**Public Counsel**

represented by **Michael Bryan Kaufman**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Paul S Aronzon**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Robert J Liubicic**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Alexandra Achamallah**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Jessica Karp Bansal**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Sameer Ahmed**  
(See above for address)  
TERMINATED: 07/29/2019

*PRO HAC VICE***Plaintiff****Esperanza Immigrant Rights Project at  
Catholic Charities**represented by **Alexandra Achamallah**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED****Michael Bryan Kaufman**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED****Paul S Aronzon**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED****Robert J Liubicic**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED****Jessica Karp Bansal**  
(See above for address)  
**ATTORNEY TO BE NOTICED****Sameer Ahmed**  
(See above for address)  
**TERMINATED: 07/29/2019**  
**PRO HAC VICE**

V.

**Defendant****United States Immigration and  
Customs Enforcement**represented by **Matthew Jimenez Barragan**  
AUSA – Office of US Attorney  
300 North Los Angeles Street Suite 7516  
Los Angeles, CA 90012  
213-894-2444  
Fax: 213-894-7819  
Email: [matthew.barragan@usdoj.gov](mailto:matthew.barragan@usdoj.gov)  
**ATTORNEY TO BE NOTICED****Defendant****United States Department of Homeland  
Security**represented by **Matthew Jimenez Barragan**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
03/20/2019	<u>1</u>	COMPLAINT Receipt No: 0973-23405523 – Fee: \$400, filed by Plaintiffs Immigrant Defenders Law Center, Esperanza Immigrant Rights Project at Catholic Charities, Public Counsel, Western State College of Law Immigration Clinic. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H) (Attorney Robert J Liubicic added to party Esperanza Immigrant Rights Project at Catholic Charities(pty:pla), Attorney Robert J Liubicic added to party Immigrant Defenders Law Center(pty:pla), Attorney Robert J Liubicic added to party Public Counsel(pty:pla), Attorney Robert J Liubicic added to party Western State College of Law Immigration Clinic(pty:pla))(Liubicic, Robert) (Entered: 03/20/2019)

03/20/2019	<u>2</u>	CIVIL COVER SHEET filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. (Liubicic, Robert) (Entered: 03/20/2019)
03/20/2019	<u>3</u>	NOTICE of Interested Parties filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic, (Liubicic, Robert) (Entered: 03/20/2019)
03/20/2019	<u>4</u>	Request for Clerk to Issue Summons on Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. (Liubicic, Robert) (Entered: 03/20/2019)
03/20/2019	<u>5</u>	Request for Clerk to Issue Summons on Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. (Liubicic, Robert) (Entered: 03/20/2019)
03/20/2019	<u>6</u>	NOTICE OF ASSIGNMENT to District Judge Christina A. Snyder and Magistrate Judge Alicia G. Rosenberg. (esa) (Entered: 03/20/2019)
03/20/2019	<u>7</u>	NOTICE TO PARTIES OF COURT-DIRECTED ADR PROGRAM filed. (esa) (Entered: 03/20/2019)
03/20/2019	<u>8</u>	60 DAY Summons issued re Complaint <u>1</u> as to defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement. (esa) (Entered: 03/20/2019)
03/20/2019	<u>9</u>	60 DAY Summons issued re Complaint <u>1</u> as to defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement. (esa) (Entered: 03/20/2019)
03/20/2019	<u>10</u>	APPLICATION for Refund of Fees Paid Re: Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. (Liubicic, Robert) (Entered: 03/20/2019)
04/18/2019	<u>11</u>	PROOF OF SERVICE Executed by Plaintiff Immigrant Defenders Law Center, Esperanza Immigrant Rights Project at Catholic Charities, Public Counsel, Western State College of Law Immigration Clinic, upon Defendant United States Immigration and Customs Enforcement served on 4/5/2019, answer due 6/4/2019. Service of the Summons and Complaint were executed upon the United States Attorneys Office by delivering a copy to Nicola T. Hanna. Executed upon the officer agency or corporation by delivering a copy to Rocio Colon. Service was executed in compliance with Federal Rules of Civil Procedure. Due diligence declaration NOT attached. Registered or certified mail return receipt attached. Original Summons NOT returned. (Achamallah, Alexandra) (Entered: 04/18/2019)
04/18/2019	<u>12</u>	PROOF OF SERVICE Executed by Plaintiff Immigrant Defenders Law Center, Esperanza Immigrant Rights Project at Catholic Charities, Public Counsel, Western State College of Law Immigration Clinic, upon Defendant Service of the Summons and Complaint were executed upon the United States Attorneys Office by delivering a copy to Nicola T. Hanna. Executed upon the officer agency or corporation by delivering a copy to Angela Fiorentino-Rios. Service was executed in compliance with Federal Rules of Civil Procedure. Due diligence declaration NOT attached. Registered or certified mail return receipt NOT attached. Original Summons NOT returned. (Achamallah, Alexandra) (Entered: 04/18/2019)
04/18/2019	<u>13</u>	PROOF OF SERVICE Executed by Plaintiff Immigrant Defenders Law Center, Esperanza Immigrant Rights Project at Catholic Charities, Public Counsel, Western State College of Law Immigration Clinic, upon Defendant United States Department of Homeland Security served on 4/5/2019, answer due 6/4/2019. Service of the Summons and Complaint were executed upon the United States Attorneys Office by delivering a copy to Nicola T. Hanna. Executed upon the officer agency or corporation by delivering a copy to Sam Hillhouse, Authorized Agent. Service was executed in compliance with Federal Rules of Civil Procedure. Due diligence declaration NOT attached. Registered or certified mail return receipt NOT attached. Original Summons NOT returned. (Achamallah, Alexandra) (Entered: 04/18/2019)

04/18/2019	<u>14</u>	REFUND OF \$400.00 made payable on April 18, 2019 to Robert J. Liubicic for payment made on March 20, 2019 Re: APPLICATION for Refund of Fees Paid Re: Complaint (Attorney Civil Case Opening) <u>1</u> <u>10</u> . (lmh) (Entered: 04/18/2019)
04/19/2019	<u>15</u>	NOTICE TO FILER OF DEFICIENCIES in Electronically Filed Documents RE: Service of Summons and Complaint Returned Executed as to USA., <u>11</u> . The following error(s) was/were found: Title page is missing. Other error(s) with document(s): Missing formal Title page with required LR 11-3.8 required party, attorney court, case information. Pdf is only set of Green postal return receipts.. In response to this notice, the Court may: (1) order an amended or correct document to be filed; (2) order the document stricken; or (3) take other action as the Court deems appropriate. You need not take any action in response to this notice unless and until the Court directs you to do so. (lc) (Entered: 04/19/2019)
05/24/2019	<u>16</u>	PROOF OF SERVICE Executed by Plaintiff Immigrant Defenders Law Center, Esperanza Immigrant Rights Project at Catholic Charities, Public Counsel, Western State College of Law Immigration Clinic, upon Defendant United States Department of Homeland Security served on 5/16/2019, answer due 7/15/2019; United States Immigration and Customs Enforcement served on 5/16/2019, answer due 7/15/2019. Service of the Summons and Complaint were executed upon the United States Attorneys Office by delivering a copy to Civil Process Clerk, Office of the United States Attorney. Executed upon the Attorney Generals Office of the United States by delivering a copy to Attorney General of the United States. Service was executed in compliance with Federal Rules of Civil Procedure. Due diligence declaration NOT attached. Registered or certified mail return receipt attached. Original Summons NOT returned. (Achamallah, Alexandra) (Entered: 05/24/2019)
06/12/2019	<u>17</u>	STIPULATION Extending Time to Answer the complaint as to re Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement.(Attorney Matthew Jimenez Barragan added to party United States Department of Homeland Security(pty:dft), Attorney Matthew Jimenez Barragan added to party United States Immigration and Customs Enforcement(pty:dft))(Barragan, Matthew) (Entered: 06/12/2019)
07/12/2019	<u>18</u>	STIPULATION for Extension of Time to File Answer to July 22, 2019 re Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement. (Attachments: # <u>1</u> Proposed Order)(Barragan, Matthew) (Entered: 07/12/2019)
07/12/2019	<u>19</u>	ORDER EXTENDING TIME FOR DEFENDANTS TO RESPOND TO INITIAL COMPLAINT TO JULY 22, 2019 <u>18</u> by Judge Christina A. Snyder (lc) (Entered: 07/12/2019)
07/22/2019	<u>20</u>	ANSWER to Complaint (Attorney Civil Case Opening),,, <u>1</u> filed by Defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement.(Barragan, Matthew) (Entered: 07/22/2019)
07/29/2019	<u>21</u>	Notice of Appearance or Withdrawal of Counsel: for attorney Sameer Ahmed counsel for Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. Sameer Ahmed is no longer counsel of record for the aforementioned party in this case for the reason indicated in the G-123 Notice. Filed by Plaintiffs Immigrant Defenders Law Center, et al.. (Ahmed, Sameer) (Entered: 07/29/2019)
08/01/2019	<u>22</u>	ORDER SETTING SCHEDULING CONFERENCE by Judge Christina A. Snyder. Scheduling Conference is set for 8/19/2019 at 11:00 AM before Judge Christina A. Snyder. (cj) (Entered: 08/01/2019)
08/05/2019	<u>23</u>	Notice of Appearance or Withdrawal of Counsel: for attorney Jessica Karp Bansal counsel for Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. Adding Jessica Karp Bansal as counsel of record for Immigrant Defenders Law Center, et al. for the reason indicated in the G-123 Notice. Filed by Plaintiff Immigrant Defenders Law Center, et al.. (Attorney Jessica Karp Bansal added to party Esperanza Immigrant Rights Project at Catholic Charities(pty:pla), Attorney Jessica Karp Bansal added to party Immigrant Defenders Law Center(pty:pla),

		Attorney Jessica Karp Bansal added to party Public Counsel(pty:pla), Attorney Jessica Karp Bansal added to party Western State College of Law Immigration Clinic(pty:pla))(Bansal, Jessica) (Entered: 08/05/2019)
08/06/2019	<u>24</u>	STIPULATION to Continue Rule 16(b) Scheduling Conference from August 19, 2019 to August 26, 2019 Re: Initial Order Setting R26 Scheduling Conference – form only <u>22</u> filed by Plaintiffs Esperanza Immigrant Rights Project at Catholic Charities, Immigrant Defenders Law Center, Public Counsel, Western State College of Law Immigration Clinic. (Attachments: # <u>1</u> Proposed Order)(Attorney Alexandra Achamallah added to party Public Counsel(pty:pla))(Achamallah, Alexandra) (Entered: 08/06/2019)
08/06/2019	<u>25</u>	ORDER CONTINUING RULE 16(b) SCHEDULING CONFERENCE <u>24</u> by Judge Christina A. Snyder. IT IS HEREBY ORDERED that the Scheduling Conference pursuant to Federal Rule of Civil Procedure 16(b) in this matter is continued from August 19, 2019 at 11:00 AM to August 26, 2019 at 11:00 AM. (lom) (Entered: 08/06/2019)
08/15/2019	<u>26</u>	NOTICE TO COUNSEL upon filing of the complaint by Judge Christina A. Snyder. (rba) (Entered: 08/15/2019)
08/15/2019	<u>27</u>	JOINT REPORT Rule 26(f) Discovery Plan ; estimated length of trial 0 days, filed by Defendants United States Department of Homeland Security, United States Immigration and Customs Enforcement.. (Barragan, Matthew) (Entered: 08/15/2019)
08/26/2019	<u>28</u>	MINUTES OF SCHEDULING CONFERENCE held before Judge Christina A. Snyder: Cause called; appearances made. Scheduling conference is not held. The Court and counsel confer regarding the pending Freedom of Information Act (FOIA) and the Vaugh Index. The Court continues the Scheduling Conference to October 21, 2019, at 11:00 a.m. at which time the parties should be prepared to update the Court on their search results and production of documents. Court Reporter: Laura Elias. (lc) Modified on 8/30/2019 (lc). (Entered: 08/30/2019)